

Continuation of Criminal Complaint

I, Nicholas Mascorro, being duly sworn, hereby depose and state as follows:

Introduction and Background

1. I am a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), and I have served as such since March 2016. I am a graduate of the Special Agent Basic Training Program at the ATF National Academy and of the Criminal Investigator Training Program at the Federal Law Enforcement Training Center. I have conducted numerous investigations into the unlawful possession and use of firearms, the possession and distribution of controlled substances, and conspiracies associated with firearm and narcotic offenses. I am presently assigned to ATF's Lansing Office. As a Special Agent with ATF, my primary duties include the investigation of alleged violations of federal firearm laws, including the subject offense of 18 U.S.C. § 922(g)(1) (felon in possession of a firearm).

2. I submit this continuation in support of a criminal complaint and arrest warrant for Jason MCCOMBS. As set forth below, I submit there is probable cause to believe that MCCOMBS committed violations of 18 U.S.C § 922(g)(1) (felon in possession of a firearm) between May, 2024 and on or about July 9, 2024, in Ingham County, Michigan.

3. The information contained in this continuation is based on information obtained in part on: (a) my personal participation in this investigation; (b) information provided by other law enforcement officers; (c) criminal history records; and (d) my personal training and experience and the training and experience of other law enforcement personnel. This continuation does not contain all the information

known as a result of this investigation, but only those facts that I believe are necessary to establish probable cause to show that Jason MCCOMBS committed violations of 18 U.S.C § 922(g)(1) (felon in possession of a firearm) on or about July 9, 2024.

4. ATF is currently conducting an investigation of Jason MCCOMBS for violations of 18 U.S.C. § 922 (g)(1) (felon in possession of a firearm).

5. I located the following felony conviction for MCCOMBS:

- a. 10/09/2002 - Felony Larceny in a Building - Pled Guilty;
- b. 03/17/2004 - Felony Home Invasion - 2nd Degree - Pled Guilty;
- c. 03/17/2004 - Felony Weapons - Firearms - Receiving and Concealing - Pled Guilty;
- d. 03/05/2008 - Felony Stolen Property - Receiving /Concealing - Felony Habitual Offender Third Offense Notice - Pled Guilty;
- e. 10/18/2010 - Felony Prostitution /Accept Earnings - Pled Guilty;
- f. 01/25/2012 - Felony Uttering and Publishing - Pled Guilty;
- g. 06/22/2016 - Felony Weapons - Firearms - Possession by Felon - Pled Guilty;
- h. 06/22/2016 - Felony Weapons Felony - Pled Guilty, and
- i. 04/21/2020 - Felony Controlled Substance – Possession of less than 25

grams - Pled Nolo Contendre.

6. On July 9, 2024, ATF executed a federal search warrant at the address MCCOMBS provided to the Michigan Secretary of State, 1133 Linwood Street, Lansing, Ingham County, Michigan. During this search warrant MCCOMBS's aunt and mother were present. MCCOMBS's mother advised that he stayed at the residence occasionally. MCCOMBS's mother and aunt both advised that MCCOMBS stays upstairs. During the search warrant execution ATF recovered the following items from the upstairs bedroom.

- a. A red and black, APF, model APF-15, multi-caliber, semiautomatic rifle bearing serial number AM009938 with 31 rounds of ammunition located inside of it;
- b. A Tactical Solutions, model X Ring, .22 caliber, semiautomatic rifle bearing serial number TSX-11139 with a silencer attached;
- c. A Radikal, model MKX-3, 12-gauge, semiautomatic shotgun bearing serial number AS-03069;
- d. An Anderson Manufacturing, model AM-15, multi caliber, semiautomatic rifle bearing serial number 21175185 and
- e. Dozens of additional rounds of ammunition.

7. Also on July 9, 2024, ATF executed another federal search warrant at 544 Baker Street, Lansing, Ingham County, Michigan and located three individuals

at the residence: MCCOMBS, Tiara Brewer and Theodore Johnson. Both Johnson and Brewer advised that MCCOMBS stays at this residence on and off and indicated that his room was the upstairs south bedroom. During the search warrant execution, the following items were seized from this bedroom:

- a. A Grand Power, model Stribog SP9A1, 9mm, pistol bearing serial number GSA23205 and
 - b. Dozens of rounds of ammunition.
8. Also recovered during the search of 544 Baker was MCCOMBS's cell phone. Pursuant to a federal search warrant a search of this phone was conducted at which time I located the following information:

- a. On April 13, 2024, MCCOMBS has a conversation with an individual via text during which MCCOMBS advised he was "On my way! To my arsenal/ bullet hideout now".
- b. On May 10, 2024, MCCOMBS sent a text saying, "At my moms for a minute with Ari shooting my gun with a silencer".
- c. On May 20, 2024, a video was captured of MCCOMBS shooting a red and black AR style firearm in the backyard of what is believed to be 1133 Linwood. This is believed to be the red and black APF rifle that was recovered on 7-9-24 at 1133 Linwood out of MCCOMBS' room during the search warrant, based on the overall appearance of the firearm in the video.

- d. On May 21, 2024, MCCOMBS sent a video via text in which he is seen exiting what is believed to be 1133 Linwood holding a black long gun. This is believed to be the black Radikal 12-gauge shotgun that was recovered on 7-9-24 at 1133 Linwood out of MCCOMBS' room during the search warrant based on overall appearance.
 - e. On June 29, 2024, MCCOMBS sent a video of MCCOMBS holding a firearm that matches the Grand Power firearm with similar markings, in what is believed to be his bedroom at 544 Baker.
 - f. On June 30, 2024, an image was captured of a Grand Power, Stribog SP9A1, 9mm pistol bearing serial number GSA23205 with clear markings on the firearm.
9. On July 22, 2024, I was advised by ATF Interstate Nexus Expert Dustin Hurt that all the above listed firearms were manufactured outside the State of Michigan.

Conclusion

10. Based on the forgoing facts, I submit there is probable cause to believe that Jason MCCOMBS has knowingly possessed firearms after previously being convicted of a felony, in violation of 18 U.S.C. § 922(g)(1) (felon in possession of a firearm). I respectfully request a warrant for MCCOMBS's arrest.